

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

----- X
NICOLE STEWART, ELIZABETH
AGRAMONTE and SUMMER APICELLA,
on behalf of themselves and all others similarly
situated,

Plaintiffs,

-against-

CASE NO.
2:21-cv-00678-JS-AYS

HAIN CELESTIAL GROUP, INC.,

Defendant.

----- X
SALLY BREDBERG and REBECCA
BROMBERG, individually and on behalf of
all others similarly situated,

Plaintiffs,

-against-

2:21-cv-00758

THE HAIN CELESTIAL GROUP, INC.,

Defendant.

----- X
ALYSSA MAYS, individually and on behalf
of all others similarly situated,

Plaintiffs,

-against-

2:21-cv-00805

HAIN CELESTIAL GROUP, INC.,

Defendant.

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MICHELLE WALLS, on behalf of herself
and all others similarly situated; and N.W.,
a minor child, by his parent and general
guardian Michelle Walls, on behalf of himself
and all others similarly situated,

Plaintiffs,

-against-

1:21-cv-00870

BEECH-NUT NUTRITION COMPANY;
THE HAIN CELESTIAL GROUP, INC.;
NURTURE, INC. D/B/A HAPPY FAMILY
ORGANICS; GERBER PRODUCTS
COMPANY; and PLUM PBC.,

Defendants.

----- X
LEE BOYD, individually and on behalf of all
others similarly situated,

Plaintiff,

-against-

2:21-cv-00884

HAIN CELESTIAL GROUP, INC.,

Defendant.

----- X
KELLY MCKEON, RENEE BRYAN, and
MARILYN CARSON, individually and on
behalf of all others similarly situated,

Plaintiffs,

-against-

2:21-cv-00938

HAIN CELESTIAL GROUP, d/b/a Earth's
Best Organics,

Defendant.

----- X

----- X
LEIBA BAUMGARTEN, individually and on
behalf of all others similarly situated,

Plaintiff,

-against-

2:21-cv-00944

THE HAIN CELESTIAL GROUP, INC.,

Defendant.

----- X
CHARLOTTE WILLOUGHBY,

Plaintiff,

-against-

2:21-cv-00970

HAIN CELESTIAL GROUP, d/b/a Earth's
Best Organics,

Defendant.

----- X

NOTICE OF MOTION

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law, the pleadings and other filings herein, and such other written or oral argument as may be permitted by the Court, Plaintiffs Nicole Stewart, Elizabeth Agramonte and Summer Apicella (“the *Stewart* Plaintiffs”), hereby move this Court, before the Honorable Joanna Seybert, United States District Court, Eastern District of New York, Alfonse M. D’Amato Federal Building, United States District Court, 100 Federal Plaza, Courtroom 1030, Central Islip, New York 11722, pursuant to Fed. R. Civ. P. 42(a), for the entry of an Order consolidating the above-captioned actions and granting such other and further relief as the Court may deem just and proper.

Respectfully submitted,

/s/ Janine L. Pollack

Janine L. Pollack, Esq.

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Agramonte and Summer Apicella and the Proposed
Class in the Stewart Action*

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on February 28, 2021, the foregoing was filed electronically. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

/s/ Janine L. Pollack
Janine L. Pollack